

# **EXHIBIT "A"**

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*\*An Illinois Limited Liability Partnership*

K. Collins, New Jersey Managing Attorney

April 23, 2008

Mark E. Felger, Esquire  
Cozen O'Connor  
Chase Manhattan Centre  
1201 North Market Street  
Suite 1400  
Wilmington, DE 19801

**Re: Shapes/Arch Holdings L.L.C.**  
**Case No.: 08-14631 (GMB) (Jointly Administered)**  
**Our File No.: 1967-13S**

Dear Mr. Felger:

I am writing to follow-up our conversation at the April 15, 2008 Shapes' Rule 341 Hearing, wherein you suggested that the Pennsauken Landfill Litigation-related creditors may be able to obtain insurance-related information for Aluminum Shapes, Inc. through a more informal email request. As discussed, I am seeking information for Aluminum Shapes, Inc.'s or other applicable Shapes' policies for the period of 1950-2007 ("Relevant Time Period"). On behalf of several of the Pennsauken Landfill Litigation-related creditors, I request the following information:

1. Identify all insurance policies for the Relevant Time period, including, but not limited to:
  - a. Carrier;
  - b. Policy number;
  - c. Type of policy;
  - d. Policy period;
  - e. Policy limits;
  - f. Whether and to what extent each policy has been eroded;
  - g. Which carriers have provided coverage for the Pennsauken Landfill Litigation;
  - h. Identify each carriers' individual percentage of total coverage for the Pennsauken Landfill Litigation; and
  - i. Provide copies of all policies.

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2. Whether any of the carriers identified in Question 1.g. have provided defense and/or indemnification under a Reservation of Rights. If so, please provide a copy of the Reservation of Rights Letter.
3. Whether any carriers identified in Question 1.g. have gone bankrupt. If so:
  - a. Identify the carrier and level of insurance;
  - b. Identify the state Guarantee Fund responsible for the policies;
  - c. If such carriers were primary, whether any of the umbrella or excess carriers have agreed to drop-down.
4. Whether any policies identified in Question 1 have been the subject of a buy back. If so,
  - a. Provide the date, terms and Agreement for the buy back;
  - b. Were any of the funds from the buy back placed in escrow.
    - i. Identify the current amount in escrow;
    - ii. If not, what was done with the funds from the buy back.
5. Whether Aluminum Shapes, Inc. was self-insured or had Self-Insured Retentions ("SIR") at any time during the Relevant Time Period. If so,
  - a. Identify the time period such was in existence;
  - b. Identify the SIR limits and any policies related to the SIR;
  - c. Whether any funds were placed into an account for payment of claims under the self-insured periods or SIRs. If so,
    - i. do these accounts still exist; and
    - ii. how much money is currently in these funds.
6. To what extent, if any, are there other claims against the policies identified in Question 1.g. If such claims exist:
  - a. Identify the other claims;
  - b. Identify the potential value of such claims; and
  - c. Identify whether the carriers have agreed to defend and/or indemnify Aluminum Shapes, Inc. in relation to those claims and whether such is under a reservation of rights.

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7. Are there any agreements between Aluminum Shapes, Inc. and its carriers related to the defense, indemnification and/or potential allocation for Aluminum Shapes, Inc. in the Pennsauken Landfill Litigation regarding its carriers continuing to defend and/or indemnify Aluminum Shapes' despite the Chapter 11 filing. If so,
  - a. Identify the carriers; and
  - b. Provide copies of said agreements.

Please contact me with any questions regarding the above requests.

Regards,

  
Kathleen J. Collins

KJC/lfm